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in his Capacity as Trustee and Foreign
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

NATALIA PIROGOVA,

Chapter 15

Case No. 18-10870 (SCC)

Debtor in a Foreign Proceeding.

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NOTICE OF APPEAL AND STATEMENT OF ELECTION

Yuri Vladimirovich Rozhkov (the “Foreign Representative”), the trustee and foreign representative of Natalia Pirogova in Pirogova’s pending insolvency proceeding under the Russian Federation Federal Law No 127-FZ “On Insolvency (Bankruptcy),” by and through his counsel, Blank Rome LLP, hereby appeals to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 158(a)(1) from the (a) *Memorandum Decision and Order Denying Recognition of Foreign Proceeding under Chapter 15 of the Bankruptcy Code* (the “Decision”) [Dkt. No. 62], entered on December 12, 2018, and (b) *Order Denying Recognition of Foreign Insolvency Proceeding as a Foreign Main Proceeding or a Foreign Nonmain Proceeding* [Dkt. No. 63] (the “Order”), entered on December 17, 2018, by the United States Bankruptcy Court for the Southern District of New York (Chapman, S.) in the above-captioned bankruptcy case. The Foreign Representative’s appeal of the Decision and Order includes, without limitation, any and all

judgments, orders, decrees, rulings, opinions and/or decisions that merged into and/or became part of the Decision and Order, that are related to the Decision and Order, and/or upon which the Decision and Order is based.

The names of all parties to the Decision and Order appealed from and the names and addresses of their counsel are as follows:

Party	Counsel
Natalia Pirogova	Victor A. Worms, Esq. LAW OFFICES OF VICTOR A. WORMS 65 Broadway, Suite 750 New York, New York 10006
M Investment Capital, LLC and Mark Shvartsburd	Harlan A. Levy, Esq. Thomas H. Sosnowski, Esq. BOIES SCHILLER FLEXNER LLP 575 Lexington Avenue New York, New York 10022
Yuri Vladimirovich Rozhkov in his capacity as Trustee and Foreign Representative for the Debtor	Rick Antonoff, Esq. Evan J. Zucker, Esq. BLANK ROME LLP The Chrysler Building 405 Lexington Avenue New York, New York 10174

There is no Bankruptcy Appellate Panel in this District and thus the optional election in Official Form 417A is not applicable.

Dated: December 26, 2018

BLANK ROME LLP

By: /s/ Rick Antonoff
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